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November 28, 2022

The Honorable Gregory B. Williams
J. Caleb Boggs Federal Building
844 N. King Street
Unit 26, Room 6124
Wilmington, DE 19801

Re: CBV, Inc. v. ChanBond, LLC, et al., C.A. No. 1:21-cv-01456-GBW

Dear Judge Williams,

I write on behalf of Defendants Deirdre Leane and IPNAV, LLC (collectively, the "Leane Defendants"), in response to Mr. Finger's letter requesting the cancellation of tomorrow's scheduled motion hearing (D.I. 182).

On October 21, 2022, the Court ordered a hearing on three pending motions: (1) Mr. Rader's *pro hac vice* motion (D.I. 153); (2) ChanBond, LLC's request for sanctions (D.I. 90), in which Leane Defendants joined (D.I. 92); and (3) the proposed intervenors' objection to sealing excerpts of the Court's October 5, 2022 Memorandum Opinion (D.I. 158). That hearing was initially scheduled for November 10, 2022, and was subsequently rescheduled to November 17, 2022 (D.I. 171) and November 29, 2022 (D.I. 177).

While Leane Defendants are not unsympathetic to Mr. Rader's personal situation, we respectfully object to the request to cancel tomorrow's scheduled hearing

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entirely, simply because Mr. Rader now requests to withdraw his *pro hac vice* motion. Rather, Leane Defendants believe that the hearing should proceed with respect to the other two pending motions. Leane Defendants also submit that rather than be withdrawn, Mr. Rader's *pro hac vice* motion should be denied as moot.

Counsel are available should the Court have any questions.

Respectfully submitted,

/s/ James H. S. Levine

James H. S. Levine (#5355)

JHSL

cc: All counsel of record